

—PROGRAM INSTRUCTION MEMORANDUM—

Texas Department of Aging and Disability Services (DADS) – Access and Intake Division

TITLE:	Nutrition Screening and Education Documentation and Reporting Requirements	NUMBER:	AAA- PI 313
SECTION:	Area Agencies on Aging	APPROVAL:	Betty Ford
ISSUE DATE:	3/25/08	REVISION DATE:	4/19/12
RELEVANT CITATIONS:	OAA, Sections 331(3), 336(2), and 339(2)(J); SPR Data Elements; 40 TAC §85.302		
DISTRIBUTION:	<input type="checkbox"/> Executive Director <input checked="" type="checkbox"/> Director <input checked="" type="checkbox"/> Fiscal Director <input checked="" type="checkbox"/> AAA Section Staff		

The Department is revising the program instruction (PI) to retract the state requirement to provide nutrition education on a monthly basis. Nutrition education must be provided to program participants annually.

Older Americans Act

The OAA requires nutrition projects to provide older individuals nutrition screening, nutrition education, and nutrition assessment and counseling if appropriate, based on the needs of meal participants. OAA's requirements are designed to solicit the expertise of a dietitian or other individual with equivalent education and training in nutrition science, or if such an individual is not available, an individual with comparable expertise in the planning of nutritional services.

Reporting Requirements for Title III and VII

Section C of the Reporting Requirements for Title III and VII - State Program Report Data Elements defines Nutrition Education as follows:

“(One session per participant) – A program to promote better health by providing accurate and culturally sensitive nutrition, physical fitness, or health (as it relates to nutrition) information and instruction to participants, caregivers, or participants and caregivers in a group or individual setting overseen by a dietitian or individual of comparable expertise.”

Texas Administrative Code

40 TAC §85.302 Nutrition Services in accordance with the Older Americans Act, §339(2)(j), an Area Agency on Aging (AAA) must ensure that a program participant is provided with nutrition screening, nutrition education, and if appropriate, nutrition assessment and counseling.

Conclusion

Effective immediately, AAAs and nutrition service providers must ensure nutrition education provided to congregate and home delivered meal participants in a group or individual setting is overseen by a dietitian or individual of comparable expertise. While nutrition education information flyers or handouts are good reinforcements of nutrition education, the distribution of flyers or handouts alone does not constitute nutrition education.

The nutrition education material must be developed or reviewed and approved by the dietitian. Other persons such as a nurse, social worker, therapist, congregate meal site director or others may provide the education if the dietitian has provided appropriate training and guidance on the use of the material.

The SPR definition will not have an impact on the Texas Nutrition Services Incentive Program (NSIP) qualification status, as nutrition education is not included in the NSIP definition to determine an eligible meal.

A copy of a ***Nutrition Education Documentation and Reporting Requirements Frequently Asked Questions*** document which outlines several questions posed and responses received from the Administration on Aging staff for clarification on this issue is attached.

AAA directors should ensure this information is shared with all nutrition service providers. Please direct any questions regarding the information contained in this program instruction to the Department's HelpDesk at T3Ahelp@dads.state.tx.us.

Attachment: (1) – Frequency Asked Questions – Revised Nutrition Education Documentation and Reporting Requirements, April 2012.

Nutrition Education Documentation and Reporting Requirements
Frequently Asked Questions

1) Question – We may have providers who send out nutrition education information flyers and handouts via mail and/or with the home delivered meal. Does this practice meet the Administration on Aging (AoA)/Older Americans Act (OAA) requirement for providing nutrition education?

AoA Response – No. Nutrition education is based on documented evidence of a group or individual session being held by a dietitian or individual of comparable expertise for all congregate and home delivered meal participants. In May 2007, the federal requirements (i.e., State Program Report Data Elements) changed which no longer considers flyers, handouts or mail-outs as nutrition education. The flyers, handouts or mail-out type material could be considered nutrition education if it is a component of the dietitian or individual of comparable expertise's individual or group educational session.

2) Question - What is the required timeframe (i.e., length of time) for the nutrition education session to be held?

AoA Response – The federal requirement does not include a specific timeframe, but at least 15 minutes would be ample time to assure the participant, family member and/or caregiver a basic level of confidence.

3) Question - The federal requirement states nutrition education should be conducted by a dietitian or individual of comparable expertise. Can you give us some examples of other professional staff which might be able to fulfill this requirement?

AoA Response – As long as the nutrition education material is developed by the dietitian, and appropriate training and guidance using the material is provided by the dietitian, a nurse, social worker, therapist, congregate meal site director, and others could provide the nutrition education to the participant, family member and/or caregiver.

4) Question – Can we continue to send out nutrition education information flyers and handouts via mail and/or with the home delivered meal?

AoA Response - Yes. The nutrition education information flyers or handouts are good sources of reinforcements. However, the flyers or handouts can not be counted as a nutrition education session.

5) Question – Do you have any other suggestions on how to meet the federal and state requirement?

AoA Response – The nutrition education session can be conducted via telephone rather than in person, as deemed appropriate. The use of telephone sessions could help address concerns regarding the potential for increased travel and mileage expenses.

April 2012